

EXHIBIT 5

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR,
Plaintiff, Pro Se
3480 Pershing Ln.
Washoe Valley, NV 89704
(775) 223-7899
Const2Audit@gmail.com

v.

WASHOE COUNTY, et al.

Defendants.

Case No.: 3:24-cv-00526-ART-CLB

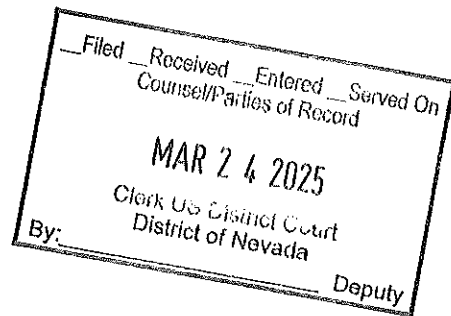


EXHIBIT 5

Title: Internal Communications Between Washoe County Library Officials Regarding
Participation in Northern Nevada Pride Parade and Vendor Booths

Date: June 24 – July 2, 2022

Source: Internal email correspondence between Washoe County Library System officials

Bates Number Range: EXH018 - EXH022

PLEADING TITLE - I

1 **Description:**

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3 This exhibit contains **internal emails** among Washoe County Library System (WCLS) officials
4 discussing their participation in the Northern Nevada Pride Parade and securing a vendor booth.

5 The emails involve the following individuals:

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 - **Jeff Scott** (Library Director)
 - 8 • **Jamie Hemingway** (Marketing Library Assistant III)
 - 9 • **Joan Dalusung** (Assistant Library Director)
 - 10 • **John Andrews** (Library Staff Member)

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12 The emails confirm the following key points:

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 1. **Washoe County Library System (WCLS) actively sought participation in the**
15 **Northern Nevada Pride Parade** and requested a **vendor booth** at the event.
 - 16 2. **Library leadership directed discretionary funding and resources** toward this
17 participation, showing institutional support for this particular advocacy event.
 - 18 3. **Staff discussions reflect internal prioritization of LGBTQIA+ programming and**
19 **involvement**, while simultaneously enforcing **viewpoint-based restrictions on**
20 **alternative perspectives.**
 - 21 4. **Coordination with external LGBTQIA+ organizations like Build Our Center**
22 **(BOC), suggesting BOC's entwinement with government operations, reinforcing its**
23 **state actor status** (Exhibit 6).

Relevance to Case:

1. First Amendment Violation – Viewpoint Discrimination

- **Evidence of selective government sponsorship and funding:**
 - These emails demonstrate that WCLS officials proactively allocated public resources to one ideological group, while denying similar access and support to other viewpoints.
 - Viewpoint discrimination by a government entity in a public forum is unconstitutional under *Rosenberger v. Rector*, 515 U.S. 819 (1995) and *Matal v. Tam*, 582 U.S. 218 (2017).
- **Social Media and Public Access Violations:**
 - Government sponsorship of an event while blocking or restricting critics on social media (see Exhibit 28) establishes impermissible viewpoint-based moderation of a designated public forum in violation of *Knight First Amendment Inst. v. Trump*, 928 F.3d 226 (2d Cir. 2019).

2. Evidence of Collaboration Between Washoe County Library System and Build Our Center (BOC) – Reinforcing State Actor Status

- The emails show clear coordination between WCLS and BOC, reinforcing that BOC was not acting as a purely private entity but rather working in concert with government officials to regulate public spaces and events.

- This strengthens the state action argument under **Lugar v. Edmondson Oil Co., 457 U.S. 922 (1982)**, increasing liability for constitutional violations committed by BOC in restricting public access (see Exhibits 27, 28, and 29).

3. Monell Liability – Washoe County Policy and Official Endorsement

- Under **Monell v. Dept. of Social Services, 436 U.S. 658 (1978)**, municipalities can be held liable for unconstitutional practices if they result from official policy or custom.
- These emails provide direct evidence of discretionary decisions made by Washoe County officials to promote one viewpoint while restricting others, making the county liable for unconstitutional viewpoint-based restrictions in public spaces.

CERTIFICATE OF AUTHENTICITY

I, **Drew J. Ribar**, hereby certify under penalty of perjury under the laws of the United States of America that the attached exhibit is a true and correct copy of email records obtained through official records requests, correspondence, and discovery materials relating to the Washoe County Library System's internal communications regarding their participation in the Northern Nevada Pride Parade and vendor booth coordination.

This document has been submitted as evidence to support **Plaintiff's claims under the First, Fourth, and Fourteenth Amendments**, as well as violations of Nevada's **Open Meeting Laws and Public Records Laws**.

1 Dated: **March 17, 2025**

2
3 **/s/ Drew J. Ribar**
4 Drew J. Ribar, Pro Se Plaintiff
5 3480 Pershing Ln.
6 Washoe Valley, NV 89704
7 (775) 223-7899
8 Const2Audit@gmail.com
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PLEADING TITLE - 5

From: Scott, Jeff <jscott@washoecounty.gov>
Sent: 02 July 2022 00:26
To: Hemingway, Jamie; Dalusung, Joan
Subject: Re: Pride parade description
Attachments:

That's awesome Jamie!! Great job!

Thank you and enjoy your weekend!

Thanks

Jeff

Jeff Scott
Library Director
Washoe County Library System
301 S. Center St. Reno, NV 89505
(775) 327-8340
jscott@washoecounty.us

From: Hemingway, Jamie <JHemingway@washoecounty.gov>;
Sent: Friday, July 1, 2022 5:25:19 PM
To: Dalusung, Joan <JDalusung@washoecounty.gov>; Scott, Jeff <jscott@washoecounty.gov>;
Subject: Re: Pride parade description

I ended up emailing the organizers to see if there was a chance we could get in as a vendor/booth. Just heard back they they've got us covered.

Looks like we will get in after all. I love starting a three day weekend with some good news.

Thanks,

Jamie

EXH018

—
Jamie Hemingway
Marketing Library Assistant III | Washoe County Library System
jhemingway@washoecounty.gov | Office: 775-327-8360
301 South Center Street, Reno, NV 89501
—————

From: Hemingway, Jamie <jhemingway@washoecounty.gov>;
Sent: Thursday, June 30, 2022 11:42 AM
To: Dalusung, Joan <JDalusung@washoecounty.gov>; Scott, Jeff <jscott@washoecounty.gov>;
Subject: Re: Pride parade description

It has definitely grown to be quite the popular event!

We're good to go for marching in the parade. I paid the fee and received confirmation. If we can't get vendor/booth space then maybe those who volunteered for that will consider marching with us instead.

Still hoping we get a lucky break though...

Jamie

—
Jamie Hemingway
Marketing Library Assistant III | Washoe County Library System
jhemingway@washoecounty.gov | Office: 775-327-8360
301 South Center Street, Reno, NV 89501
—————

From: Dalusung, Joan <JDalusung@washoecounty.gov>;
Sent: Thursday, June 30, 2022 11:40 AM
To: Hemingway, Jamie <jhemingway@washoecounty.gov>; Scott, Jeff
<jscott@washoecounty.gov>;
Subject: Re: Pride parade description

I'm glad it's become such a popular event!

EXH019

-Joan

Joan Dalusung

Assistant Director | Washoe County Library System
jdalusung@washoecounty.gov | Office: 775.327.8345
301 S. Center St., Reno, NV 89501

From: Hemingway, Jamie <JHemingway@washoecounty.gov>;
Sent: Thursday, June 30, 2022 10:55 AM
To: Scott, Jeff <jscott@washoecounty.gov>;
Cc: Dalusung, Joan <JDalusung@washoecounty.gov>;
Subject: Re: Pride parade description

Hello,

I was able to apply for us to participate in the parade but we are on the waitlist to participate as a vendor/booth. Unfortunately they were sold out and waitlist status is the only thing available for now.

I'm hoping we can still get in. Definitely a good reminder for me not to wait too long to apply. I will let the outreach team know the status.

Kicking myself for not doing it earlier, but it's been a week!

Jamie

EXH 020

Jamie Hemingway
Marketing Library Assistant III | Washoe County Library System
jhemingway@washoecounty.gov | Office: 775-327-8360
301 South Center Street, Reno, NV 89501

From: Scott, Jeff <jscott@washoecounty.gov>;
Sent: Friday, June 24, 2022 4:36 PM
To: Hemingway, Jamie <JHemingway@washoecounty.gov>;
Cc: Dalusung, Joan <JDalusung@washoecounty.gov>; Andrews, John
<JAndrews@washoecounty.gov>;
Subject: Re: Pride parade description

Looks good!

Thank you Jamie!

Jeff

Jeff Scott
Library Director
Washoe County Library System
301 S. Center St. Reno, NV 89505
(775) 327-8340
jscott@washoecounty.us

From: Hemingway, Jamie <JHemingway@washoecounty.gov>;
Sent: Friday, June 24, 2022 3:53:02 PM
To: Scott, Jeff <jscott@washoecounty.gov>;
Cc: Dalusung, Joan <JDalusung@washoecounty.gov>; Andrews, John
<JAndrews@washoecounty.gov>;
Subject: Pride parade description

Hello,

I'm working on getting our parade and vendor application for Pride submitted. Please take a look at the description draft I created for the parade. I used to help Andy write these, so this one is pretty standard,

EXH021

but I'm happy to make any edits if you'd like. I want to submit this soon--early bird pricing ends July 1 so the sooner the better. If not by today then by Monday.

Happy Northern Nevada Pride from your friendly librarians at Washoe County Library! We're proud to support the LGBTQIA+ community, and we're committed to being an inclusive and welcoming space for everyone. We're your number one destination for free access to books, online resources, digital downloads, and exciting events like Drag Queen Story Time! Stop by and pick up your free library card at any one of our 12 library locations! We can't wait to see you there. Happy Pride!

Thanks!

Jamie

—
Jamie Hemingway
Marketing Library Assistant III | Washoe County Library System
jhemingway@washoecounty.gov | Office: 775-327-8360
301 South Center Street, Reno, NV 89501

EXH022